

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO

UNITED STATES OF AMERICA,	:	Case No. 5:18-cv-00029
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
ADEN S. MILLER, individually and	:	<u>ANSWER OF DEFENDANT,</u>
As Trustee of A K ENTERPRISE,	:	<u>LESLEE MAST, HOLMES COUNTY</u>
KATHRYN B. MILLER, individually	:	<u>TREASURER</u>
And as Trustee of A K ENTERPRISE,	:	
STATE OF OHIO, DEPARTMENT OF	:	
TAXATION, and TREASURER OF	:	
HOLMES COUNTY, OHIO,	:	
	:	
Defendants.	:	

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Now comes Defendant, Leslee Mast, Holmes County Treasurer, by and through her undersigned attorney, and for her Answer to Plaintiff's Complaint states as follows:

- 1) As alleged in paragraph 5 of Plaintiff's Complaint, answering Defendant admits that she has an interest in the real property at issue by virtue of liens for both current and delinquent taxes (if applicable) arising out of the real estate tax laws.
- 2) The Defendant is without knowledge or information sufficient to form a belief as to the truth of all other allegations contained in Plaintiff's Complaint.
- 3) Wherefore, Defendant, Holmes County Treasurer demands that her tax liens be found to be valid and subsisting liens on the subject property; that her first priority, as provided by law, be protected in any and all subsequent proceedings; that upon a foreclosure sale pursuant to Ohio law all real estate taxes be paid to the date of sale; and that the Court grant her such other and further relief to which she may be entitled.

Respectfully submitted,

**Holmes County Prosecuting Attorney**

By: /s/ Sean Warner

**Sean Warner** (#0075110)  
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**CERTIFICATE OF SERVICE**

I hereby certify that on April 9, 2018, a true and accurate copy of the Answer of Defendant Holmes County Treasurer, was served via the Court's Electronic Case Filing System upon the following parties who are listed on the Court's Electronic Mail Notice List:

- Mary A. Stallings: [mary.a.stallings@usdoj.gov](mailto:mary.a.stallings@usdoj.gov), [northern.taxcivil@usdoj.gov](mailto:northern.taxcivil@usdoj.gov);
- Joseph M. McCandlish: [Joseph.McCandlish@ohioattorneygeneral.gov](mailto:Joseph.McCandlish@ohioattorneygeneral.gov); and
- United States of America: [northern.taxcivil@usdoj.gov](mailto:northern.taxcivil@usdoj.gov).

The following parties were served via regular U.S. Mail:

Aden S. Miller, individually and as  
Trustee of A K Enterprise  
8037 Township Road 561  
Holmesville, OH 44633

Kathryn B. Miller, individually and as  
Trustee of A K Enterprise  
8037 Township Road 561  
Holmesville, OH 44633

**Holmes County Prosecuting Attorney**

By: /s/ Sean Warner

**Sean Warner** (#0075110)  
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